

Before the
Federal Communications Commission
 Washington, D.C. 20554

RECEIVED

JUL 20 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Common Carrier Bureau Seeks Comment)	CC Docket No. 80-286
on Proposed Streamlined ARMIS 43-04)	
(Jurisdictional Separations) Report)	

COMMENTS OF SBC COMMUNICATIONS, INC.

Southwestern Bell Corporation, for itself and its wholly owned affiliates (collectively SBC), submits the following comments in response to *Public Notice* (PN), DA 01-1496, on the content of a streamlined Separations Report (ARMIS 43-04), released June 22, 2001, in the above captioned docket.

The Commission recently issued an Order adopting the recommendation of the Federal-State Joint Board for an interim freeze on all separation category relationships and allocation factors for price cap companies, and on all allocation factors for rate-of-return carriers.¹ In that order, the Commission concluded that it could streamline its current separations reporting requirements, while receiving sufficient information to evaluate the freeze and consider further separations reform. SBC applauds the FCC in making another step toward streamlining the reporting process by proposing to reduce the total number of pages in the ARMIS 43-04 Report (Jurisdictional Separations Report) from the current 63 pages to seven pages. This proposed change is certainly a step in the right direction toward regulatory reform. However, SBC recognizes that more can be done in this particular phase of the streamlining docket that could move us closer to

¹ See Jurisdictional Separations and Referral to the Federal-State Joint Board, CC Docket No. 80-286, *Report and Order*, FCC 01-162 (rel. May 22, 2001).

No. of Copies rec'd 014
 List A B C D E

eliminating regulation that is "no longer necessary to the public interest." 47 C.F.R. §161(b). SBC strongly supports the comments of the United States Telecom Association (USTA) filed in this phase of the proceeding. SBC is hereby submitting alternative ARMIS Report streamlining suggestions for the Commission's consideration in the event it rejects those proposed by USTA.

Specifically, SBC urges the Commission to remove the rows pertaining to Equal Access from the proposed ARMIS 43-04 Report², and instead require that this data be reported in the appropriate accounts. This reporting would be consistent with the current ARMIS 43-01 reporting requirement; thus the administrative burden in reporting this information in the new ARMIS 43-04 would be significantly reduced. This change, coupled with the recommendations proposed by USTA in its comments would further streamline the 43-04 Report.

The FCC recently issued a *Public Notice*³ (*Notice*) which proposed changing the current Part 32 Uniform System of Accounts (USOA). Should this new chart of accounts be adopted, SBC suggests the Commission further reduce the ARMIS 43-04 Report by collapsing the revenue sections for Basic Local and Long Distance into the total balance of accounts 5000 (Basic Local Revenue) and 5100 (Long Distance Message Revenue). Since the detail in existing expense accounts 6621 (Call completion services), 6622

²See Common Carrier Bureau Seeks Comment on Proposed Streamlined ARMIS 43-04 (Jurisdictional Separations) Report, *Public Notice*, DA 01-1496 (rel. June 22, 2001); Table I – Separations and Access Table, page 1 of 7--Rows 30 (Total Equal Access Investment); 40 (Equal Access Accumulated Depreciation); 44 (Equal Access Current Def. Oper. Income Taxes); 46 (Equal Access Non-Current Def. Oper. Inc. Taxes); 83 (# Equal Access Minute of Use); and 84 (Total Equal Access Expenses).

³ *Commission Seeks Further Comment in Phase 2 of the Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local*

(Number services), and 6623 (Customer Services) will only be recorded in account 6620 (Customer Services), a composite allocation factor should be developed from the current frozen Part 36 allocations. This composite allocation factor should then be used to report total Customer Services expenses as a single account.

Furthermore, if the Commission's proposed Part 32 Chart of Accounts are adopted, then the detail accounts for Depreciation and Amortization will also be consolidated. Therefore, only the balance of accounts 6560 (Depreciation Expense) and 3100 (Accumulated Depreciation) would be reported in the proposed new ARMIS 43-04. Additionally, detail currently recorded in accounts 7340 (Allowance for Funds Used During Construction), and 7370 (Special Charges) will be consolidated into account 7300 (Non-Operating Income/Expense) in the new Part 32 chart of accounts. This also applies to the proposed accounts 7100, 7500 and 7600 since these accounts will also contain consolidated information. Thus, the consolidation of all these accounts will eliminate the need to report the individual account details on the ARMIS 43-04 Report, further streamlining the report.

Finally, for simplification, SBC urges the Commission to move all of the Part 36 and Part 69 allocation data from Table I of the ARMIS 43-04 Report to a proposed separate table. (See Attachment I). This change would assist in identifying the allocation data, and add clarity to Table I. Additionally, SBC proposes moving the columns for Total Company, Non-regulated, and Adjustments from the current ARMIS 43-01 Report to the ARMIS 43-04 Report; thereby eliminating the need for the ARMIS 43-01 (See Attachment II).

SBC strongly urges the Commission to adopt USTA's proposed 43-00 Report which consolidates the information from the ARMIS financial reports (43-01, 43-02 schedules BI and BII, 43-03, and 43-04); or alternatively to adopt SBC's proposed changes to the ARMIS 43-04 as displayed in Attachment I to this filing. Eliminating the ARMIS 43-01 Report and streamlining the ARMIS 43-04 Report would reduce the regulatory burden on incumbent local exchange carriers, and further the Commission's goal of regulatory reform.

Respectfully submitted,

SBC Communications Inc.

By: Juanita Harris
Juanita Harris
Roger K. Toppins
Paul K. Mancini

1401 I Street NW 11th Floor
Washington, D.C. 20005
202-326-8893-Phone
202-408-8745-Facsimile

Its Attorneys

July 20, 2001

SBC Attachment I

FCC Report 43-04
ARMIS Separations Report

Company: XXXXXXXXXXXX
Study Area: XXXXXXXXXXXX
Period: From January XXXX to December XXXX

XXXX Version
Submission XXX
Table I
Page 1 of 5

TABLE I. SEPARATIONS and ACCESS TABLE

Row	Category (a)	Total (b)	Nonreg. Direct (c)	Nonreg. Common (d)	Adjustments (e)	Subject to Separations (f)	Non Interstate (g)	Interstate (h)	Common Line (i)	Total Traffic Sens. (n)	Special Access (o)	Total Access (p)	Billing & Collection (q)	IX (r)
PLANT IN SERVICE INVESTMENT														
1000	General Support Facilities Investment	0	0	0	0	0	0	0	0	0	0	0	0	0
1112	Total COE Category 1 Switchboards	N/A	N/A	N/A	N/A	0	0	0	N/A	0	N/A	0	N/A	0
1129	Total COE Cat. 1 Service Observing Boards	N/A	N/A	N/A	N/A	0	0	0	N/A	0	N/A	0	N/A	0
1154	Total COE Cat. 1 Auxiliary Service Boards	N/A	N/A	N/A	N/A	0	0	0	N/A	0	N/A	0	N/A	0
1168	Total COE Cat. 1 Traffic Service Position	N/A	N/A	N/A	N/A	0	0	0	N/A	0	N/A	0	N/A	0
1170	Total Central Office Equipment Category 1	0	0	0	0	0	0	0	N/A	0	N/A	0	N/A	0
1201	Cat. 2 Tandem Switching Equip. Dir. Asn. Msg.	N/A	N/A	N/A	N/A	0	0	0	N/A	0	N/A	N/A	N/A	N/A
1202	Cat. 2 Tandem Switching Equip. Jointly Used	N/A	N/A	N/A	N/A	0	0	0	N/A	0	N/A	N/A	N/A	N/A
1204	Total Central Office Equipment Cat. 2	N/A	N/A	N/A	N/A	0	0	0	N/A	0	N/A	0	N/A	0
1212	COE Cat. 3 Local Switching	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
121X	Total COE Switching	0	0	0	0	0	0	0	0	0	0	0	0	0
1220	COE Cat. 4 WDBD. Exch. Ln. Ckt. Equip. Pvt. Ln.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1222	COE Cat. 4 WDBD. Exch. Ln. Ckt. Equip. Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1224	Total COE Category 4.11	N/A	N/A	N/A	N/A	0	0	0	N/A	0	0	0	N/A	0
1230	COE Cat. 4.12 Exch. Trk. Ckt. (Non-WDBD) PL	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1231	COE Cat. 4.12 Exch. Trk. Ckt. (Non-WDBD) Msg.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1232	COE Cat. 4.12 Exch. Trk. Ckt. (Non-WDBD) Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1234	Total COE Cat. 4.12 Basic Non-WDBD	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1240	COE Cat. 4.12 Special Non-WDBD	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1250	COE Cat. 4.12 Exch. Trk. Ckt. Equip. (WDBD) - PL	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1252	COE Cat. 4.12 Exch. Trk. Ckt. Equip. (WDBD) - Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1254	Total COE Category 4.12 Wideband	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1260	Total COE Cat. 4.12 Exch. Trk. Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	0	0	0	N/A	0
1274	COE Cat. 4.13 Exch. Ckt. Equip. - PL	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1275	COE Cat. 4.13 Exch. Ckt. Equip. - Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1277	Total COE Cat. 4.13 Exch. Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1280	Special COE Cat. 4.13 Exch. Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1290	Total COE Category 4.13	N/A	N/A	N/A	N/A	0	0	0	0	N/A	0	0	N/A	N/A
1300	Total COE Cat. 4.1 Exchange Line Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
1310	COE Cat.4.21 Furnished to Another Co.	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A
1320	COE Cat. 4.22 IX Ckt. Equip. (WDBD) - PL	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1322	COE Cat. 4.22 IX Ckt. Equip. (WDBD) - Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1324	Total COE Cat. 4.22 IX Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	0	0	0	N/A	0
1336	COE Cat. 4.23 IX Ckt. Equip. (WDBD)	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1338	COE Cat. 4.23 IX Ckt. Equip. - Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1342	Total COE Cat. 4.23 Basic IX Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1350	COE Cat. 4.23 Special IX Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1370	Total COE Cat. 4.23 IX Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	0	0	0	N/A	0
1380	Total COE Cat. 4.2 IX Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	0	0	0	N/A	0
1342	COE Cat. 4.3 Host/Remote Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1400	Total COE Cat. 4 Circuit Equipment	0	0	0	0	0	0	0	0	0	0	0	N/A	0

TABLE I. SEPARATIONS and ACCESS TABLE

Row	Category (a)	Total (b)	Nonreg. Direct (c)	Nonreg. Common (d)	Adjustments (e)	Subject to Separations (f)	Non Interstate (g)	Interstate (h)	Common Line (i)	Total Traffic Sens. (n)	Special Access (o)	Total Access (p)	Billing & Collection (q)	IX (r)
PLANT IN SERVICE INVESTMENT (cont.)														
1410	Total COE Investment	0	0	0	0	0	0	0	0	0	0	0	N/A	0
1420	IOT Cat. 1 Information Origination / Termination	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1425	Other IOT - Part 69	N/A	N/A	N/A	N/A	N/A	N/A	0	0	N/A	0	0	N/A	N/A
1428	Total IOT Cat. 1 Information Orig/Term	N/A	N/A	N/A	N/A	0	0	0	0	N/A	0	0	N/A	N/A
1430	IOT Cat. 2 New Customer Premises Equip.	N/A	N/A	N/A	N/A	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1440	Total Information Origination / Termination	0	0	0	0	0	0	0	0	N/A	0	0	N/A	N/A
1454	C&WF Cat. 1 Exchange Line - Direct Asn.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1455	C&WF Cat. 1 Exchange Line - Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1460	Total C&WF Category 1 Exchange Line	N/A	N/A	N/A	N/A	0	0	0	0	N/A	0	0	N/A	N/A
1470	C&WF Cat. Non-WDBD Exch. Trk. - PL	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1471	C&WF Cat. Non-WDBD Exch. Trk. - Dir. Msg.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1472	C&WF Cat. Non-WDBD Exch. Trk. - Joint	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1474	Total C&WF Cat. Non-WDBD Exch. Trk.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1480	C&WF Cat. WDBD Exch. Trk. - Dir. PL	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1481	C&WF Cat. WDBD Exch. Trk. - Dir. Msg.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1484	Total C&WF Cat. 2 WDBD Exchange Trunk	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1485	Total C&WF Cat. 2 Exchange Trunk	N/A	N/A	N/A	N/A	0	0	0	N/A	0	0	0	N/A	0
1496	C&WF Cat.3 IX PL Direct Assign	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1497	C&WF Cat.3 IX Message Direct Assign	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1498	C&WF Cat.3 IX Joint Message	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1510	1510 Total C&WF Cat.3 IX	N/A	N/A	N/A	N/A	0	0	0	N/A	0	0	0	N/A	0
1522	C&WF Cat.4 Host/Remote Joint Message	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
1524	Total C&WF Cat.4 Host/Remote	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
1530	Total C&WF	0	0	0	0	0	0	0	0	0	0	0	N/A	0
1540	Total Telephone Plant - all Categories	0	0	0	0	0	0	0	0	0	0	0	0	0
OTHER TELECOMMUNICATIONS PROPERTY														
2001	Tangible Assets General Support - Cap. Leases	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
2002	Tangible Assets COE Switching - Cap. Leases	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
2013	Total Capital Leases Allocation - Part 69	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
2020	Total Tangible Assets - Capital Leases	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
2070	Tangible Assets Gen. Supt. - Leasehold Imp.	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
2130	Tangible Assets Leasehold Imp. - Part 69	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
2131	Comb. Invest. Used to Alloc. Tot. Leasehold Imp.	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
2140	Total Tangible Assets - Leasehold Imp.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
2150	Total Other Tangible Assets	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
2160	Intangible Assets	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
2161	TPIS less Intangible Assets to Alloc. Part 69	N/A	N/A	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
2190	Property Held for Future Telecom. Use	0	0	0	0	0	0	0	0	0	0	0	0	0
2191	Telecommunication Plant Under Construction	0	0	0	0	0	0	0	0	0	0	0	0	0
2193	Telecommunications Plant Adjustment	0	0	N/A	0	0	0	0	0	0	0	0	0	0
2203	Total Other Plant Investment	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
2210	Rural Telephone Bank Stock	0	0	0	0	0	0	0	0	0	0	0	0	0
2224	Total Inventories	0	0	0	0	0	0	0	0	0	0	0	0	0

SBC Attachment I

FCC Report 43-04
ARMIS Separations Report

XXXX Version
Submission XXX
Table I
Page 3 of 5

Company: XXXXXXXXXX
Study Area: XXXXXXXXXX
Period: From January XXXX to December XXXX

TABLE I SEPARATIONS and ACCESS TABLE

Row	Category (a)	Total (b)	Nonreg. Direct (c)	Nonreg. Common (d)	Adjustments (e)	Subject to Separations (f)	Non Interstate (g)	Interstate (h)	Common Line (i)	Total Traffic Sens. (n)	Special Access (o)	Total Access (p)	Billing & Collection (q)	IX (r)
OTHER TELECOMMUNICATIONS PROPERTY (CONT.)														
2230	Cash Working Capital	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
2240	Total Other Investment	0	0	0	0	0	0	0	0	0	0	0	0	0
2250	FCC Investment Adjustment	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
2260	Total Telecommunications Property	0	0	0	0	0	0	0	0	0	0	0	0	0
RESERVES and DEFERRALS														
3000	Other Jurisdictional Assets	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3010	Accumulated Depreciation - General Support	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3020	Accumulated Depreciation - Switching	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3030	Accumulated Depreciation - Operator Equip.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3040	Accumulated Depreciation - Transmission Equip.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3050	Accumulated Depreciation - IOT	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	N/A
3060	Accumulated Depreciation - C&WF	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3070	Accum. Depr. - Property Held for Future Use.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3080	Total Accumulated Depreciation	0	0	0	0	0	0	0	0	0	0	0	0	0
3090	Accumulated Amortization - GSF	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	4	5
3100	Accumulated Amortization - COE Switching	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3110	Accumulated Amortization - Capital Leases	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3150	Total Accumulated Amortization	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3220	Total Accumulated Amortization - Leasehold Imp.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3230	Total Accumulated Amortization - Tangible Assets	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3240	Accumulated Amortization - Intangible Assets	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3250	Other Accumulated Amortization	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3251	Assoc. Invest. used to Alloc. Oth. Accum. Amort.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3260	Total Accum. Amort. - Intangible Assets	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3270	Total Accumulated Amortization	0	0	0	0	0	0	0	0	0	0	0	0	0
3280	Current Deferred Oper. Income Taxes - GSF	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3290	Current Deferred Oper. Income Taxes - Sw. Equip.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3300	Current Deferred Oper. Income Taxes - Oper. Sys.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3310	Current Deferred Oper. Income Taxes - Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3320	Current Deferred Oper. Income Taxes - IOT	N/A	N/A	N/A	N/A	0	0	0	0	N/A	0	0	N/A	N/A
3330	Current Deferred Oper. Income Taxes - C&WF	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3332	Other Current Deferred Oper. Income Taxes	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3340	Total Net Current Deferred Oper. Income Taxes	0	0	0	0	0	0	0	0	0	0	0	0	0
3350	Non-Current Deferred Oper. Inc. Taxes - GSF	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3360	Non-Current Deferred Oper. Inc. Tax - Sw. Equip.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3370	Non-Current Deferred Oper. Inc. Tax - Oper. Sys.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3380	Non-Current Deferred Oper. Inc. Tax - Ckt. Equip.	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3390	Non-Current Deferred Oper. Inc. Tax - IOT	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	N/A
3400	Non-Current Deferred Oper. Inc. Tax - C&WF	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
3402	Other Non-Current Deferred Oper. Inc. Tax	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
3410	Total Net Non- Current Deferred Oper. Inc. Tax	0	0	0	0	0	0	0	0	0	0	0	0	0
3420	Other Jurisdictional Liabilities	0	N/A	N/A	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE I SEPARATIONS and ACCESS TABLE

Row	Category (a)	Total (b)	Nonreg. Direct (c)	Nonreg. Common (d)	Adjustments (e)	Subject to Separations (f)	Non Interstate (g)	Interstate (h)	Common Line (i)	Total Traffic Sens. (n)	Special Access (o)	Total Access (p)	Billing & Collection (q)	IX (r)
RESERVES and DEFERRALS (cont.)														
3421	FCC Reserve Adjustment	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
3422	Customer Deposits	0	0	0	0	0	0	0	0	0	0	0	0	0
3423	Other Deferred Credits	0	0	0	0	0	0	0	0	0	0	0	0	0
3430	Total Taxes and Reserve Deferrals	0	0	0	0	0	0	0	0	0	0	0	0	0
OPERATING REVENUES and CERTAIN INCOME ACCOUNTS														
4005	Total Basic Local Revenue	0	N/A	0	0	0	0	0	N/A	N/A	0	0	N/A	N/A
4010	Network Access Service - End User Revenues	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A
4011	Network Access Service - Switched Access Rev.	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A
4012	Network Access Service - Special Access Rev.	N/A	N/A	N/A	N/A	0	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A
4013	Network Access Service - State Access Rev.	N/A	N/A	N/A	N/A	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4014	Total Network Access Service Revenues	0	N/A	0	0	0	0	0	0	0	0	0	N/A	0
4024	Total Long Distance Revenues	0	N/A	0	0	0	0	0	0	0	0	0	N/A	0
4033	Total Miscellaneous Revenues	0	0	0	0	0	0	0	0	0	0	0	0	0
4040	Total Uncollectible Revenue	0	0	0	0	0	0	0	0	0	0	0	0	0
4050	Total Revenues	0	0	0	0	0	0	0	0	0	0	0	0	0
406X	Total Other Operating Income & Expense (acct 7100)	0	0	0	0	0	0	0	0	0	0	0	0	0
407X	Total Non- Operating Income & Expense (acct 7300)	0	0	0	0	0	0	0	0	0	0	0	0	0
409X	Extraordinary Items (acct 7600)	0	0	0	0	0	0	0	0	0	0	0	0	0
OPERATING EXPENSE														
5000	Network Support Expense	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
5010	General Support Expense	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
5013	Total Network & General Support Expense	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
5026	Total COE Expense	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
5060	Total IOT Expense	N/A	N/A	N/A	N/A	0	0	0	0	N/A	0	0	N/A	N/A
5076	Total C&WF Expense	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	N/A	0
5080	Total Plant Specific Expense	0	0	0	0	0	0	0	0	0	0	0	0	0
6000	Other Property Plant & Equipment Expense	0	0	0	0	0	0	0	0	0	0	0	N/A	0
6010	Network Operation Expense	0	0	0	0	0	0	0	0	0	0	0	N/A	0
6012	Access Expense	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	0
609X	Total Depreciation & Amortization Expense (acct 6560)	0	0	0	0	0	0	0	0	0	0	0	0	0
7000	Total Marketing Expense	0	0	0	0	0	0	0	0	0	0	0	N/A	0
7320	Total Customer Services Expense (acct. 6620)	0	0	0	0	0	0	0	0	0	0	0	0	0
7334	Total General & Admisitrative Expense (acct 6720)	0	0	0	0	0	0	0	0	0	0	0	0	0
735X	Interest and Related Items (acct 7500)	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
7351	Total Operating Expenses	0	0	0	0	0	0	0	0	0	0	0	0	0
8000	State & Local Taxes to be Allocated	0	0	0	0	0	0	0	0	0	0	0	0	0
8002	Other State & Local Taxes Direct Assign	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
8003	All Other State and Local Taxes - Part 36	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
8005	Total All Other State and Local Taxes - Pt. 69	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
8007	Operating State and Local Taxes	0	0	0	0	0	0	0	0	0	0	0	0	0
8010	Operating Taxes - FIT Fixed Charges - Sub. Tax. Inc.	0	0	0	0	0	0	0	0	0	0	0	0	0
8013	Operating Taxes - FIT IRS Income Adjustment	0	N/A	N/A	0	0	0	0	0	0	0	0	0	0

SBC Attachment I

FCC Report 43-04
ARMIS Separations Report

Company: XXXXXXXXXX
Study Area: XXXXXXXXXX
Period: From January XXXX to December XXXX

XXXX Version
Submission XXX
Table I
Page 5 of 5

TABLE I SEPARATIONS and ACCESS TABLE

Row	Category (a)	Total (b)	Nonreg. Direct (c)	Nonreg. Common (d)	Adjustments (e)	Subject to Separations (f)	Non Interstate (g)	Interstate (h)	Common Line (i)	Total Traffic Sens. (n)	Special Access (o)	Total Access (p)	Billing & Collection (q)	IX (r)
OPERATING EXPENSE (cont.)														
8014	FCC Taxable Income Adjustment	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
8015	Investment Tax Credit Adjustment					0	0	0	0	0	0	0	0	0
8018	FCC Investment Tax Credit	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
8020	Federal Income Tax					0	0	0	0	0	0	0	0	0
Return Data														
8040	Return Data - Average Net Investment	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0
8041	Return Data - Net Return	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	N/A	N/A
8042	Return Data - Rate of Return	N/A	N/A	N/A	N/A	N/A	N/A	0	0.00	0.00	0.00	0.00	N/A	N/A

TABLE II PART 32 and PART 69 ALLOCATORS

[illegible]

SBC Attachment II

Mapping of current ARMIS 43-01 to SBC's proposed 43-04 report

Current 43-01 Row #	Comments	Proposed SBC 43-04 Row #	Comments
Revenues			
1010		4005	Based on proposed FCC Pt. 32 NPRM
1020		4014	
1030		4025	Based on proposed FCC Pt. 32 NPRM
1040		4033	Based on proposed FCC Pt. 32 NPRM
1045	Deleted with FCC proposed Pt. 32 NPRM	-----	
1050	Deleted with FCC proposed Pt. 32 NPRM	-----	
1060		4040	
1090		4050	
Expenses			
1120		5080	
1130		6000+6010	
1140		7000	
1150		7320	
1160		7334	
1170		6012	
1180		6090+6160	
1185		735X	Propose entering the balance of account 7500
1190		7351	
Other Operating Items			
1290		406X	Propose entering balance of account 7100
Non-operating Items			
1320	Assumption that reporting will change to current Class B method for all carriers for these rows.		
1330			
1340			
1350			
1360			
1370			
1390			
		407X	Propose entering balance of account 7300
		409X	Propose entering balance of account 7600
Other Taxes			
1410		8000	
1420		8002+8003	
1490		8007	
Federal Income Taxes			
1510		8010	
1520		8013	
1530		8014	
1540		8015	
1550		8018	
1590		8030	
Plant-in-Service			
1620		1000	
1630		1170	
1640		121X	Propose adding total cat. 2 and cat. 3
1650		1400	
1660		1530	
1670		1440	
1680		2150+2160	
1690		1540	

SBC Attachment II

Current 43-01 Row #	Comments	Proposed SBC 43-04 Row #	Comments
Other Investment			
1705		3000	
1710		2190	
1720		2191	
1730		2193	
1740		2210	
1750		2220	
1760		2224	
1770		2230	
1780		2250	
1790			
Reserves			
1820		3080	
1830		3270	
1840		3340+3410	
1850		3422	
1870		3423	
1881			
1882			
1883		3420	
1885		3421	
1890			
Return Data			
1910		8040	
1915		8041	
1920		8042	

CERTIFICATE OF SERVICE

I, Regina Ragucci, do hereby certify that on this 20th day of July, 2001, a copy of the foregoing Comments of SBC Communications was served by hand delivery to the parties listed below:

*Ernestine Creech
Accounting Safeguards Division
Federal Communications Commission
445 12th Street, SW, Room 6-C317
Washington, DC 20554

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*ITS
445 12th Street, SW
Washington, DC 20554



Regina Ragucci